

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

MAY 10 2019

David J. Bradley, Clerk

United States of America

v. *Raul pco*Carlos Gonzalez, Derrick Lerma, Reynaldo Lerma,  
& Fernando LermaCase No. *M-19-1061-M**Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 5/9/2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section*21 U.S. Code § 841  
21 U.S. Code § 846*Offense Description*Possession with Intent to Distribute 10 Kilograms of Cocaine  
Conspiracy To Possess with Intent to Distribute 10 Kilograms of Cocaine

This criminal complaint is based on these facts:

See Attachment A

☐ Continued on the attached sheet.*N**Complainant's signature*

Special Agent Nathan Foster, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 05/10/2019 *8:29 am*City and state: McAllen, Texas*Peter S. Ormsby*  
*Peter S. Ormsby*  
*U.S. Magistrate Judge*  
*Printed name and title*

On May 9, 2019, Special Agents of the Federal Bureau of Investigation (FBI) began surveillance on 2604 Garfield Ave, APT 1, Alton TX. At approximately 11:15am, CARLOS GONZALEZ (GONZALEZ) arrived in the parking area driving a white, Nissan Sentra. GONZALEZ entered Apartment 1.

At approximately 11:30am, DERRICK LERMA (D. LERMA) and REYNALDO LERMA (R. LERMA) arrived in the parking area in a maroon, Dodge Ram. In tandem with the Dodge Ram, FERNANDO LERMA (F. LERMA) arrived in a grey, Ford F-150. All three men exited the vehicles and entered the apartment under surveillance.

Shortly thereafter, agents approached the apartment and interviewed R. LERMA. R. LERMA stated that he was driving the maroon Dodge Ram and gave verbal consent to search his vehicle. Upon opening the toolbox in the bed of the truck, Agents observed a trash bag containing 10 separate bricks of what appeared to be narcotics. Agents conducted a field test on one of the bundles which indicated the presence of cocaine.

Subsequently, GONZALEZ stated that all parties had made an agreement for 10 kilograms of cocaine to be transported to Ohio. GONZALEZ stated that R. LERMA, D. LERMA, F. LERMA, and he met on May 8, 2019 in Donna, TX to discuss the transportation of the 10 kilograms of cocaine. D. LERMA gave GONZALEZ \$1,000 as a down payment for GONZALEZ to coordinate the transportation of the 10 kilograms. D. LERMA also agreed to deliver another \$1,000 to GONZALEZ upon the delivery of the cocaine. At the time of his arrest, D. LERMA was in possession of \$1,000 in \$100 bills and wrapped in a rubber band. During an interview of D. LERMA he stated that he was involved in order to "pay bills."